

HCSA Peer Review Report

IOI Group – PT. Kalimantan Prima Agro Mandiri (PT. KPAM)

Dear peer reviewers: Thank you for agreeing to do a desk audit of this HCS assessment. The intention is to validate the HCS assessment against key minimum requirements of the methodology, and to use your knowledge and experience to flag major issues that could be improved. For the sections which you have been asked to review, please provide very brief feedback on the questions, for instance yes/no/somewhat, followed by a few sentences explaining your answer.

Background information to be provided by the HCSA Secretariat:

a) Did a Registered Practitioner Organization lead the HCS assessment? If not, has the organization which led the assessment started the process of registration?

Yes, Aksenta is a Registered Practitioner Organisation.

- b) Was the HCS Team Leader a Registered Practitioner? Yes, Bias Berlio Pradyatma lead the assessment and is a registered practitioner.
- c) Were at least 2 HCS team members Registered Practitioners? No, Bias Berlio is the only registered practitioner on the team.
- d) Was the HCV assessment judged 'satisfactory' (highest rating) by the HCV Resource Network (HCVRN) Assessor Licensing Scheme (ALS)? (See https://www.hcvnetwork.org/als/public-summaries).

According to the HCVRN website, as of 7 December 2017 the evaluation status is **Satisfactory 3** - Report is **Satisfactory at second resubmission**, the case is closed and the Public Summary is published.

53 HCV Assessment PT PT Kalimantan Kaliman Prima Agro Mandiri Prima A (PT. KPAM), Mandiri Indonesia		ng 10/04/2017 diyanto ovisional	Satisfactory 3 Click here	24/11/2017
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Questions for peer reviewers Peer Review Panel: George Kuru, Triagus Sugiyanto, Asep Y. Firdaus, Dadan Setiawan

1. Peer Review Summary

1.1. What are the major findings and recommendations from the peer review?

Finding and Reviewers Recommendation:

- 1. The type and status of the license has been clarified in the report as recommended.
- 2. "Section 2 Social Issues" has been rewritten as recommended.
- a) The revised report clearly documents the community consultation / surveying / mapping / socialization was conducted, in which communities, who conducted the consultation and when.
- b) The revised report clearly describes the status of the social issues identified in community consultation and the programs in place to manage current and future social issues in tables 8 and 9.
- c) The revised report identifies that the local communities were fully informed of their rights and when entering into consultations and negotiations.
- 3. "Section 2 Social Issues" has been substantially rewritten in the revised report to meet the requirements of the recommendations.
- 4. The revised report provides clear definitions of the HCSA vegetation cover types and has resolved conflicting terminology used to describe some vegetation cover types.
- 5. The revised report provides a full methodology for methodology for sample design, measuring inventory plots, and calculating carbon stocks.
- 6. The revised report provides carbon stocks for all carbon pools including stem biomass for trees >5cm DBH.
- 7. The revised report provides comprehensive carbon stock reporting.
- 8. The revised report provides a description of patch analysis. Because all forest area patch areas have been designated as HCSA, no detailed patch analysis is required.
- 9. The section on ICLUP in the revised report clearly shows how the integrated conservation and land use plan was analyzed or prepared.



1.2. Did the HCS assessment team include or have adequate access to relevant expertise to undertake the HCS assessment?

Finding and Reviewers Recommendation:

The reports state the general training and experience of the assessment team in section 2. However, the relevant training certificates for HCV, HCS-A and FPIC for each team member has not been provided. Include in section 2.1 the relevant training certificates for HCV, HCS-A and FPIC for each team member.

The company has attached herewith the link: http://highcarbonstock.org/hcs-approach-quality-review-process/hcs-approach-registered-organisations/

The revised report meets the requirements of the peer review recommendations.

1.3. What elements of the HCS Approach still need to be completed in order to create a final land use and conservation plan? Are there aspects which you feel need to be re-done?

Finding and Reviewers Recommendation:

- 1. The Summary Report clearly define what is the licensing type and status for the project area. The "Public Summary Report High Conservation Value Assessment PT Kalimantan Prima Agro Mandiri (PT. KPAM) as an IUP and this should be recorded in the Summary Report.
- 2. "Administratively, the IUP is located in Danau Buntar village, Kendawangan Subdistrict and Sukaramai village, Manismata Subdistrict of Ketapang District, West Kalimantan Province, Indonesia. Astronomically, the area is located at 110055'20" E 111007'00" E and 2042'20" S 2049'00" S (Figure 1).
- 3. "IUP" will be issued after the acquisition of land had been done. This report is assumed that the IUP has not been completed. It needs to be clarified.

The company stated that it has been addressed in Section 1.2.



2. Social Issues

2.1. Does the summary provided in Section 3.1 adequately represent and explain the community engagement, FPIC processes, and participatory mapping activities carried out?

Finding and Reviewers Recommendation:

- The company has updated the report with an elaboration of Community Engagement, FPIC processes and participatory mapping as we can read in section 3 of the report.
- The company has elaborated the report with the process of getting representatives of the community/villagers. After readthrough the section 3 of the report, there is information regarding how the community engagement and FPIC processes were done.
- Considering the information provided in page 11 of the report said that "Community that is living in and around PT KPAM's IUP area especially in these three villages, mostly a Dayak and local Malay people", but there is no information about the dayat/malay adat leaders confirmation / agreement in term of the status of "Customary Land and/or forest". There is only the confirmation from Villages Official. As we know, Formal leader like Village Official and Informal leader like Adat Leader has a different status. Beside Village official, adat leader need to be asked for his agreement on behalf of his community.
- The map is still in general based on the map.2. but that is good enough on the decision to respect who did not want to relinquish the land, as it is mentioned in the sentences as follow: "In this process, the community have been given a complete freedom whether or not to relinquish their lands. The company also highlighted the community partnership scheme that is required under the Government regulation, and the affected community can become part of the partnership program. The company also respects to those whom have chosen not to relinquish their lands and the measures for this issues is tabled in Table 7: Management Plan to address Social Issues in PT. KPAM, with the goal "Partnership with local community to manage PT. KPAM sustainably is established"



2.2. Has a tenure study been completed and has it been vetted by independent social experts?

Finding and Reviewers Recommendation:

20% of licensed area must be allocated as partnership scheme is a legal obligation must be fulfilled by the company, the legitimation of the company will be stronger if they get adat community agreement regarding the statement "there is no customary land/forest". When the report said the "mostly a Dayak and local Malay people who live in and around the licensed area" it means there are customary authority implicitly.

The revised report meets the requirements of the peer review recommendations.

2.3. Is there a participatory land use map and does it contain the key components of community land use including the minimum requirement of 0.5 ha per person for future garden areas?

Finding and Reviewers Recommendation:

It is informative enough to have elaboration on HCV5 and it looks like the process has been conducted well. The information regarding minimum requirement of 0,5 ha per person for future garden has not been elaborated.



2.4. Is there a record of consultation with affected communities and FPIC processes on the proposed development, the HCS Approach and issues/concerns they raised? Did the community nominate their own representatives?

Finding and Reviewers Recommendation:

- 1. There is record of meeting / consultation process with the affected community, but it seems very limited. The report does not provide more detail except list of meeting with a limited information. Therefore, the information on how the FPIC processes and community nominate their own representatives are not clear elaborated.
- 2. Refers to the module 2-social requirements of HCSA toolkit #2 principle and #7 principle, the report at least could provide the information as follow: How do the local communities and other land users express right to give or withhold their Free, Prior and Informed Consent (FPIC) to operations planned on their lands, and how they expressed through their own freely chosen representative institutions?

The company responded that the social issues that were raised are summarized in the Table 8 and 9, and solutions were also identified in order to reduce the impacts.

The revised report meets the requirements of the peer review recommendations.

2.5. Were their views addressed and reflected in the plans and implementation of the plantation? Is there specific reference to the customary owners being made aware that they can say no to the development and they have the right to independent legal representation with regard to their agreements before they sign (to meet the 'prior informed' test)?

Finding and Reviewers Recommendation:

- 1. The report says:
- a. It can be seen in socialization conducted by the company that the locals have been given a complete freedom whether or not to relinquish their lands. For those wanting to relinquish their lands, GRTT, with no fixed amount as of yet, will be given. The locals generally approve the company to develop its plantation so that the lands will become productive. The locals' consideration is based on the hope that there will be dependable economic benefits. All villages have even determined that all their villagers have the right not only to relinquish their lands, but also to have plantation partnership with the company.
- b. The company respects those whom have chosen not to relinquish their lands. The company gives the option to become enclave, not acquired to be developed into a plantation. Those whom have refused are few in numbers. Those refused have their lands outside of the claimed lands by Berkah Bersama Lestari cooperative. Those refused are from Danau Buntar village and elder people whom still have a strong attachment to cultivation.



2. We cannot find the information about the process of specific reference to the customary owners being made aware that they can say no to the development and they have the right to independent legal representation with regard to their agreements before they sign (to meet the 'prior informed' test).

To double check with the assessor and then review the relevant section of the summary report.

The company stated that the FPIC evaluation was carried out (as stated in Section 3.3 of the revised document) to justify their effort in FPIC.

The revised report meets the requirements of the peer review recommendations.

2.6. What recommendations do you have for any improvements regarding community consultation and negotiation of Free, Prior and Informed Consent?

Finding and Reviewers Recommendation:

It is not clear whether the communities were fully informed of their rights. Clearly state if the FPIC process was conducted in a way that shared all information about rights to the indigenous / local community before the developers invite them to enter in the process of consultation or negotiation.

The company stated yes and responded that the first meeting that was held in April 2015 where the company shared all information about rights to the indigenous/local community before the developers invite them to enter in the process of consultation or negotiation. The FPIC evaluation was carried out (as stated in Section 3.3) to justify our effort in FPIC.



- 3. Ecological and Conservation Values
- 3.1. Does the summary provided in Section 4.1 of the Summary Report adequately represent the findings of the HCV study?

Finding and Reviewers Recommendation:

A summary of the HCV report can provide an overview of the HCV study and findings in the concession site. The report is clear and acceptable.

3.2. If the HCV assessment was not judged satisfactory (highest rating) by the ALS scheme of the HCVRN (as noted in the introductory information from the HCS Secretariat – please see page one of this document), please do a cursory review of the HCV report as it relates to HCVs 1-4. Do you have any general comments on the quality of the site description, the analysis of the landscape and national or regional context, or the methods used to undertake the HCV study? Were the determinations of the absence/presence and extent of HCVs 1-4 well-justified? Are the HCV management and monitoring maps accurate?

Finding and Reviewers Recommendation:

Primary data collection methods have not explained in detail, considerations in taking, selecting and determining the number of samples and sample locations. In the final HCV report (Page 32) the result of the observation in code line Ga-06 (Table 4.3) is said a peatland (match with soil map, page 25), but the analysis is not HCV. The sampling methodology needs to be clarified. The methodology for allocation HCV on peatland types needs to be clearly stated and the status of Ga-06 clarified.

The company responded that the HCV identification was carried out through community mapping, interview and also public consultation.

The final report references the HCV report which independently provides the methodology of the HCV. The final report shows the main findings of the HCV and impact on HCSA. The revised report meets the requirements of the peer review recommendations.



3.3. Please review Section 9.2 of the Summary Report. Was the methodology used for the Pre-RBA and the Rapid Biodiversity Assessments (if any) satisfactory? Did the RBA(s) reveal any significant biodiversity values that should have been captured in either the HCV assessment but were not, or warrant protection?

Finding and Reviewers Recommendation:

There are no issues around Pre-RBA and RBA.

3.4. Are the forest conservation management and monitoring activities outlined in Section 10.3 adequate? Do they take into account forests and protected areas outside the concession?

Finding and Reviewers Recommendation:

For the initial peer reviewer's findings, recommendations have been prepared for management and monitoring activities for HCV areas included the HCS area, but analysis potential of HCS area buffer 1 km outside concession is not yet been carried out. (not shown on the map in summary report).

- 1. Complete desktop analysis buffer 1 km outside concession to identify potential connection patch HCS.
- 2. Complete the land use planning map, final recommendation of the land with category for develop and conservation area.
- 3. Continue activity for participation conservation planning with community, local government and company.

The company has responded that:

- 1. Not much patches that was identified.
- 2. The land use planning was conducted to produce ICLUP.
- 3. Participation conservation planning with community, local government and company will be continued as planned in Table 8 and table 9 in order to identify measures the community-related issues.

In conclusion, since the report has included all forest patches as HCSA, there is no need to patch analysis. All HCSA and HVC have been included as conservation areas. The revised report meets the requirements of the peer review recommendations.



- 4. Image Analysis
- 4.1. Please review Section 6.1 of the Summary Report. Was the Area of Interest correctly identified?

Finding and Reviewers Recommendation:

In the initial peer reviewer's findings:

- 1. Section 6.1 Describe the license area and its buffer outside (1km) following the recommendation of HCS toolkit. The map in the section 6.3 Figure 7 showing the licensed area and buffer 1km area (AOI).
- 2. Text defining the license area boundary is found in section 1.1. Area inside the license area boundary is 11.000 ha, shapefile data file is provided we have checked and confirmed about this licensed area. However the shapefile data of AOI (with 1 km buffer) is not submitted so we can't check this area.
- 3. The recommendation from the HCS toolkit about the area of interest already Implemented by the assessor.

The peer reviewer's recommendation states that from the Landsat imagery view we can see that the AOI is contain of vegetation in dryland and wetland so best practice would be to include even more of the surrounding area as AOI to see the connectivity. Best practice are using the watershed boundary to define the landscape area.

The company responded that the boundary of the watershed is bigger and we don't have the imagery coverage of the said area (which extended up to watershed level). However, as stated in table 26, as part of our Landscape approach plan, we are planning to do the HCS with other stakeholders so that we will be able to cover larger area and supported by other stakeholders.

4.2. Please review Section 6.2 of the Summary Report. Were the images used of adequate quality, including resolution and date?

Finding and Reviewers Recommendation:

In the initial peer reviewer's findings:

- 1. Report indicates data used for stratification was Landsat 8 with path/row 120/62 and spatial resolution at 30 m. The image acquisition date on March 12, 2016. According to the information about HCS identification timeline in Section 2.2, which is March 2016 March 2017, indicate that the assessor already using the recent image for the analysis.
- 2. The image quality is clear from the cloud and haze make the land cover stratification more easily. The original image data are submitted so we can check the acquisition date and spatial resolution in its metadata.
- 3. Landsat image is the minimum image that recommendation by the HCS toolkit it's indicate that the assessor already implemented the HCS recommendation image for process of initial land cover.



The peer reviewer's recommendation states that:

- 1. The Landsat image used by assessor are using the 30m spatial resolution meanwhile Landsat image can be upgrade to have a better spatial resolution (15 m) by using the band 8 (that had 15 m resolution) of the Landsat in the proses of remote sensing. The higher the image data give more information about the land cover.
- 2. Best practice to use the higher resolution than 30m (landsat). Reviewer suggest to use the Sentinel imagery with the spatial resolution 10m data which is free to get.

The company responded that during the implementation of the study which is on 2015-2016, the availability of the imagery was limited, compared to the current scenario.

4.3. Please do a quality check using the images provided in 6.3. Was the initial vegetation classification done properly? Do the land cover areas in the tables in Section 6 look reasonable? Are there any obvious errors in classification?

Finding and Reviewers Recommendation:

- 1. List the number and type vegetation classes used in section 6.4 of the summary report. Preferably a table should be made that records the name, code, and description of each vegetation cover type. Where the vegetation cover types differ from the generic HCS vegetation cover types, then a justification should be included.
- 2. The land cover result indicate that the company using the manual visual interpretation. The Landsat image is quite clear so we can easily see the differences class in it so it is better if the classification method using the automatic unsupervised or supervised classification. The result of the land cover will be more accurate and variation.
- 3. Reviewer suggest the assessor to repeat the initial vegetation using the unsupervised and supervised classification, to get more variation and clear edge of the land cover class. The landsat image is quite clear give you more information about the small patches of vegetation (forest/ YRF) due to no cloud cover and haze, the image also give you clear enough the information where the area are contain water (wetland).
- 4. The information about ground check plot location (shapefile) and its information about the tree dimension need to provide to make easy on analysis of land cover class.

The company has responded to the reviewer's recommendations below:

1. This is addressed in Section 4.1 (page 26) of the revised HCSA document. Refer also Table No 11 and photos as shown in page 28 and 29.



- 2. We are using supervised classification, combined with the manual classification (due to the cloud cover). Accuracy assessment was carried out using Kappa accuracy.
- 3. During the implementation of the study which is in 2015-2016, the availability of the imagery was very limited, compared to the current scenario. We are using supervised classification, combined with the manual classification (due to the cloud cover). Accuracy assessment was carried out using Kappa accuracy.
- 4. Observation plots were used as a ground truthing. Refer to Map 10 (page 33).



5. Forest Inventory

5.1. Please review Sections 7.1 and 7.2 of the Summary Report. Were the sample plots selected, set up, and measured properly? Please check the inventory plot layout for adequacy.

Finding and Reviewers Recommendation:

- 1. Section 7.1 of the Summary Report does not clearly state the sampling method used to locate plots in the field. The sampling method is identified in section 7.3 as stratified random sampling. State the sampling method used to locate plots in Section 7.1 and use more clear English in this section.
- 2. The GPS location of plots are not provided in the plot data. Therefore it is not possible to check the plot vegetation classification. The GPS location of plots should be included in the plot list.

The company responded that the observation plots were used as a ground truthing. Refer to Map 10 (page 33).

The revised report meets the requirements of the peer review recommendations.

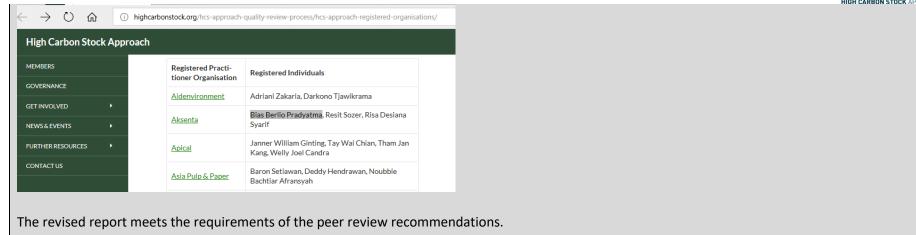
5.2. Please review Section 7.3 of the Summary Report. Was the forest inventory team qualified?

Finding and Reviewers Recommendation:

- 1. At least one member of the forest inventory team should have HCS-A training certification. List the HCS-A training certification of the field team. At least one member should have training.
- 2. It would be sufficient to provide the person with supervisory role over the forest inventory from Section 2.1, provided that person has HCS-A training.

The company responded that the Team leader is a registered HCS-A practitioner.





5.3. Please review Section 7.4 of the Summary Report. Was the allometric chosen adequate?

Finding and Reviewers Recommendation:

- 1. The plot layout is different from that required by the HCS-A toolkit, but adequate for HCS forest inventory.
- 2. The carbon pools assessed in the forest inventory are different to those required by HCS-A. The forest inventory measures live tree biomass (DBH>5cm), undergrowth, climbers, dead trees, and litter. HCS-A only specifies the measurement of live tree biomass (DBH>5cm).
- 3. The inventory report does not clearly identify what variables have been assessed in measurement of the plots.
- 4. The carbon reporting should report live tree biomass (DBH>5cm) separately from the other carbon pools.
- 5. Section 7.4 should include a description of the variables assessed in the inventory plots. E.g. biomass component (live tree, dead tree, undergrowth, litter), DBH, tree height, species, crown density, etc.

The company responded that it has been addressed in Section 4.2 (page 32-37) of the HCSA document. All the information that is reported in our HCS report is based on the study done by Aksenta in year 2015-2016.



5.4. Please review Sections 7.5, 7.6, 7.7 and 7.8 of the Summary Report, and do a cursory review of the forestry data and statistical analysis. Are there any obvious errors in the raw forestry data? Are there any flags where a result does not seem consistent with your rough interpretation of the land cover image? Do the final carbon classes seem accurate given what is known about other forests in the region?

Finding and Reviewers Recommendation:

- 1. A basic description should be included that describes how above ground biomass for live trees (DBH>5cm) is calculated from the data collected in the field.
- 2. The method for converting live tree biomass to molecular carbon should be described.
- 3. A list of actual allometric tree equations used should be included in the text along the source reference.
- 4. The methods for calculating non-tree carbon pools should be described separately.
- 5. Additional photographs should be provided for each vegetation type.
- 6. Revise the report to use consistent vegetation classifications.
- 7. The inventory reporting (Section 7.8/7.9) to be completed asper the comments above.

The company responded that for *finding and reviewers recommendations* of 1-4, it has been addressed in Section 4.2 (page 32-37). All the information that is reported in our HCS report is based on the study done by Aksenta in year 2015-2016.

And for finding and reviewers recommendation of 5-7, it has been addressed in Table 11 (page 28 onward), including photos as shown in page 28 and 29.



- 6. Land use planning
- 6.1. Please review Section 8.1 of the Summary Report. Was the initial vegetation classification map adequately calibrated and adjusted to take into account forest inventory results?

Finding and Reviewers Recommendation:

- 1. There is no explanation of the calibration and adjusted the land cover. It is not possible to comment in the calibration process.
- 2. The spatial data (shp) data of initial and final land cover should be provided to find the differences before and after calibration.
- 3. The plot inventory data and tree inventory information are important to provide as they are the key for calibration the land cover.

The company responded that the accuracy is carried out using Kappa accuracy, as we also follow the basic flowchart as mentioned in HCSA Toolkit Forest and vegetation stratification.

The revised report meets the requirements of the peer review recommendations.

6.2. Please review Section 9 of the Summary Report. Was participatory mapping data used in step one to identify community lands that should be enclaved? Were patches merged correctly? Was the core area correctly identified? Was the connectivity analysis done correctly?

Finding and Reviewers Recommendation:

- 1. The information about the community land should be put in the spatial data (mapping), it should be containing a location and information about land owners and its activity. Reviewer suggested that the assessor completed participatory mapping based on the information in section 3.
- 2. Patch analysis spatial data should be provided to make easy on testing of core size, connectivity, risk assessment and integration with other conservation area (HCV, Peatland, wetland, etc).

The company stated to please refer to the output of the exercise which is ICLUP. They acknowledge their land utilization by the three community and as agreed and supported by Dinas, 20% of the oil palm development area, to be excised and managed for the communities in three villages. Patch analysis spatial data will be carried out at a landscape level.



6.3. Please review Section 9 of the Summary Report, and select a few sample patches to test that the Decision Tree was used correctly. Were the patches correctly identified as High, Medium, or Low Priority? Was the Patch Analysis done according to the HCS Approach Decision Tree?

Finding and Reviewers Recommendation:

- 1. The spatial data of patch analysis process need to be provided to make easy on testing its content.
- 2. If the land cover stratification is redone (using high image data, ex. Sentinel) then all patch analysis work will have to be repeated.
- 3. Reviewer take a sample patches number 3 and calculate the core area using the negative buffer 100m. the result show that the patches number 3 has core size 250 ha, and it goes to be a High Priority patches (core > 100 ha). This result are different from the assessor result because Reviewer took the whole YRF area outside the AOI as a HCS patch.
- 4. Reviewer suggest that all the patches area should be taken as patches regardless its location are outside the AOI, therefore the patch analysis need to be repeated.

The company stated that this will be done at a landscape level, as described in one of our management plan to address the HCS area at a bigger scale. Please refer to Management Plan in Table 26, page 59, Action No 6.4.



6.4. Please review Sections 10.1 and 10.2 of the Summary Report. Were the final integrated conservation and land use planning steps completed to maximize the ecological and social viability of the conservation areas (HCV, HCS, peatland, riparian zones, customary forest, etc)? Were the results of the final ground verification (if any) adequately incorporated into the land use plan and final HCS map?

Finding and Reviewers Recommendation:

- 1. The report doesn't describe the processes of the integrated conservation and land use plan that combine ecological and social viability.
- 2. There are no community land that had been put in the final HCS map due to no participatory mapping, therefore the assessor need to make a participatory mapping based on the data in the section 3.
- 3. The assessor need to make a final ICLUP map that show the area of indicative conservation, indicative development and community land without overlapping between those classes.

The company stated that to please refer to the output of the exercise which is ICLUP. We acknowledge their land utilization by the three community and as agreed and supported by Dinas, 20% of the oil palm development area to be excised and managed for the communities in three villages.